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Santa Monica Airport  
Office of the Airport Manager  
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Santa Monica, California 90405

DEPARTMENT OF TRANSPORTATION  
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City of  
**Santa Monica™**

February 11, 2004

Department of Transportation/Federal Aviation Administration  
Docket Management System

**RE: Document FAA-2003-16526-29**

The City of Santa Monica has previously commented on the proposed Stage IV regulations at the time they were originally proposed by the Federal Aviation Administration to the International Civil Aviation Organization. The City's position regarding proposed Stage IV regulations continues to be as follows:

- That Stage IV standards be applied to all aircraft, including those under 75,000 pounds
- That a noise reduction of at least 14dB from Stage III noise standards is necessary to have any significant effect
- That there be a phase-out of all aircraft that cannot meet a standard of being certified as being below -5 dB of the Stage III standard, including aircraft under 75,000 pounds

Below is the text of Santa Monica City Council Resolution 9697 adopted September 11, 2001. It provides the context of the City's concerns and the opportunity it's suggested more vigorous new standards could provide for communities around airports.

**A RESOLUTION OF THE CITY COUNCIL  
OF THE CITY OF SANTA MONICA SUPPORTING EFFECTIVE STAGE IV  
AIRCRAFT NOISE STANDARDS**

**WHEREAS**, the International Civil Aviation Organization (ICAO), of which the Federal Aviation Administration is a member, is considering options for a new international aviation noise certification standard, being described as "Stage IV," which, if adopted, will result in a phase-out of the current Stage III aircraft noise certification standard, including a phase-out of originally certified Stage II aircraft that have been retrofitted and re-certified to meet Stage III standard; and

**WHEREAS**, The standards adopted by ICAO are part of an international treaty and subsequently are generally adopted by the United States as the national standard; and

**WHEREAS**, Aircraft noise has and continues to negatively impact communities near airports generally throughout the United States including Santa Monica; and

**WHEREAS**, The standards that will be established by the Stage IV requirements are extremely important as they can be expected to be in effect for the next 15 to 20 years, defining the level of effort and commitment to improving the noise environment of our communities, and

**WHEREAS**, The Airport Council International-North America (ACI-NA), representing airports throughout the United States and Canada, has established that the currently proposed standard of a 10 dB reduction (below current Stage III requirements) is already essentially met by nearly all aircraft being manufactured (over 75,000 pounds) and therefore tantamount to an effectively “no change” approach and therefore inadequate, and

**WHEREAS**, ACI-NA has further determined that a greater than 14 dB reduction is feasible, in fact a number of aircraft could already meet such a standard and that with a reasonable commitment the technology is realizable generally, and

**WHEREAS**, ACI-NA has determined that as much as 60% of the noise (though only 25% of the operations) generated by aircraft using airports is from marginal Stage III aircraft (within -5 dB of Stage III standard), many of which are re-certified or modified Stage II aircraft, and

**WHEREAS**, ACI-NA has determined that the most immediate and significant general improvement to aircraft noise on airports and surrounding communities would be the phasing out of marginal Stage III aircraft (aircraft that cannot be certified to be quieter than -5 dB of Stage III standards), and

**WHEREAS**, The increased noise reduction standards of each stage have required a significant reduction of aircraft noise and its impacts which continues to be essential and urgent to the well-being of communities in the vicinity of airports; and

**WHEREAS**, Smaller airports such as Santa Monica Airport, which have operational weight limits failed to receive the full benefit of Stage III standards and requirements because aircraft under 75,000 pounds were exempted by ICAO and the subsequent United States requirements, even though those aircraft include a wide variety of business

jet and turboprop aircraft. Said aircraft's use of the airport contributes the most significant aircraft noise impact upon the community, and

**WHEREAS**, Smaller municipal airports such as Santa Monica and its neighboring communities have the same types of concerns, impacts, and needs regarding aircraft that use their facilities as larger airports and their surrounding communities and should not be denied the same protection and rights regarding national standards for aircraft design and operation

**NOW, THEREFORE**, the City Council of the City of Santa Monica does resolve and proclaim as follows:

**SECTION 1.** The City Council supports the efforts of the Federal Aviation Administration and the International Civil Aviation Organization to establish a new Stage IV aircraft noise certification standard.

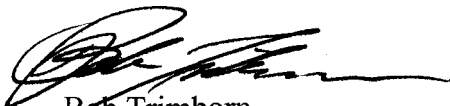
**SECTION 2.** The City Council finds it essential to well-being of communities adjacent and near to municipal airports that are increasingly being used and impacted by business jets that Stage IV requirements be applied to all aircraft, including those under 75,000 pounds.

**SECTION 3.** The City Council strongly supports the recommendations of the Airport Council International – North America that the needed standard for Stage IV to significantly improve the noise situation for all airports requires a noise reduction of at least 14 dB.

**SECTION 4.** The City Council further strongly supports the phase-out of all aircraft that being below -5 dB of the Stage III standard, including aircraft under 75,000 pounds. cannot meet a standard of being certified as

If you have any questions regarding these comments, please contact me at 310.458.8591.

Sincerely,



Bob Trimbora  
Airport Manager  
Santa Monica Airport